REMARKS

In a first Office Action dated March 9, 2006, the Examiner rejected claims 1-23 under 35 U.S.C. §102(e) as being anticipated by Cheng et al. (U.S. patent application no. 2003/0224774, hereinafter referred to as "Cheng"). The rejections are traversed and reconsideration is hereby respectfully requested.

The Examiner rejected claims 1-23 under 35 U.S.C. §102(e) as being anticipated by Cheng. Claim 1 has been amended to provide for, in response to receipt of the communication channel allocation request, allocating a communication channel at a target base station subsystem (BSS) to a mobile station (MS), informing the MS of the allocated communication channel, receiving, by the target BSS from the MS, first uplink data that includes an MS identifier associated with the MS, determining, based on the first uplink data and by reference to the record, that the MS has initiated a cell reselection, receiving second uplink data from the MS, routing the second uplink data to an Serving GPRS Support Node (SGSN), and determining, by the SGSN and based on the second uplink data, that the mobile station has initiated a cell reselection.

Nowhere does Cheng teach an SGSN or anything concerning the functionality of an SGSN. Therefore, Cheng does not teach the features of claim 1 of determining, by a network, that an MS has initiated a cell reselection based on received first uplink data while the SGSN determines that the MS has initiated a cell reselection based on second received uplink data that. Accordingly, the applicants respectfully request that claim 1 may now be passed to allowance.

Since claims 2-6 depend upon allowable claim 1, the applicants respectfully request that claims 2-6 may now be passed to allowance.

Claim 13 teaches a packet control unit (PCU) that receives, from an MS, a message requesting allocation of a communication channel at a target BSS, allocates a communication channel at the target BSS to the MS, informs the MS of the allocated communication channel, receives, from the MS and via the target BSS, first uplink data, determines, based on the first uplink data and by reference to the record, that the MS has initiated a cell reselection, receives second uplink data from the MS, and routes the

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second uplink data to a SGSN, wherein the second uplink data indicates to the SGSN that a cell reselection has occurred. As described above, Cheng teaches nothing concerning an SGSN and therefore does not teach the PCU of claim 13 that determines that the MS has initiated a cell reselection based on first received uplink data and that receives and routes, to an SGSN, second uplink data that indicates to the SGSN that the MS has initiated a cell reselection. Accordingly, the applicants respectfully request that claim 13 may now be passed to allowance.

Since claims 14-19 depend upon allowable claim 13, the applicants respectfully request that claims 14-19 may now be passed to allowance.

Claim 8 provides for receiving, from an MS, a message requesting allocation of a communication channel at a target BSS, in response to receipt of the communication channel allocation request, allocating a communication channel at the target BSS to the MS, informing the MS of the allocated communication channel, initiating a count down of a predetermined time period, and when no uplink data is received via a source BSS after the initiation of the count down and prior to the expiration of the predetermined time period, determining that the MS has performed a cell reselection. These features are not taught by Cheng.

Cheng teaches an implementation of a channel switch delay in response to receiving of a request from an MS for a switch from a first cell to a second cell. During the channel switch delay, no new data can be exchanged between the MS and the first cell - only retransmitted packets and acknowledgements may be exchanged. Upon expiration of the channel switch delay, the MS can begin to exchange new data with the second cell. In other words, Cheng teaches an assumption that the MS has performed a cell reselection upon expiration of the channel switch delay. Cheng does not teach any determination that the MS has performed a cell reselection based on a failure to receive data from the MS during the channel switch delay as the MS is not even allowed to transmit data to the first cell during the channel switch delay.

Therefore, Cheng does not teach the features of claim 8 of allocating a communication channel at a target BSS to an MS, informing the MS of the allocated

communication channel, initiating a count down of a predetermined time period, and when no uplink data is received via a source BSS after the initiation of the count down and prior to the expiration of the predetermined time period, determining that the MS has performed a cell reselection. Accordingly, the applicants respectfully request that claim 8 may now be passed to allowance.

Since claims 9-12 depend upon allowable claim 8, the applicants respectfully request that claims 9-12 may now be passed to allowance.

Claim 20 teaches a PCU that receives, from an MS, a message requesting allocation of a communication channel at a target BSS, allocates a communication channel at the target BSS to the MS, initiates a count down of a predetermined time period with reference to the timer and, when no uplink data is received by the PCU via a source BSS after the initiation of the count down and prior to the expiration of the predetermined time period, determines that the MS has performed a cell reselection. As described in detail above, Cheng does not teach such a PCU. Accordingly, the applicants respectfully request that claim 20 may now be passed to allowance.

Since claims 21-23 depend upon allowable claim 20, the applicants respectfully request that claims 21-23 may now be passed to allowance.

As the applicants have overcome all substantive rejections and objections given by the Examiner and have complied with all requests properly presented by the Examiner, the applicants contend that this Amendment, with the above discussion, overcomes the Examiner's objections to and rejections of the pending claims. Therefore, the applicants respectfully solicit allowance of the application. If the Examiner is of the opinion that any issues regarding the status of the claims remain after this response, the Examiner is invited to contact the undersigned representative to expedite resolution of the matter.

Respectfully submitted,

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